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CHUNGHWA PICTURE TUBES, LTD. and
CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

Best Buy Co. Inc. et al. v. Hitachi, Ltd. et al., No.
3:11-cv-05513-SC

CompuCom Sys., Inc. v. Hitachi, Ltd. et al., No.
3:11-cv-06396-SC

Interbond Corp. of Am. v. Hitachi, Ltd. et al., No.
3:11-cv-06275-SC

Office Depot, Inc. v. Hitachi, Ltd. et al., No.
3:11-cv-06276-SC

*P.C. Richard & Son Long Island Corp. et al. v.
Hitachi, Ltd. et al.*, No. 3:12-cv-02648-SC

*Sears, Roebuck and Co. et al. v. Chunghwa
Picture Tubes, Ltd. et al.*, No. 3:11-cv-05514-SC

*Target Corp. v. Chunghwa Picture Tubes, Ltd. et
al.*, No. 3:11-cv-05514-SC

**DECLARATION OF WANG CHI CHENG
IN SUPPORT OF DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S MOTION FOR
SUMMARY JUDGMENT ON DIRECT
ACTION PLAINTIFFS' STATE LAW
CLAIMS ON DUE PROCESS GROUNDS**

Date: February 6, 2015
Time: 10:00 A.M.
Judge: Hon. Samuel Conti

I, Wang Chi Cheng, hereby declare and state as follows:

1. My current position with Chunghwa Picture Tubes, Ltd. ("CPT") is CFO in the Finance Department. I am a resident of Taiwan. I am an adult over eighteen (18) years of age. The statements in this Declaration are based on my own personal knowledge, and if called as a witness I could, and would, testify competently that the matters set forth herein are true.

2. CPT and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. ("CPTM") have produced transactional sales data in this litigation to the Direct Action Plaintiffs. Based on my review of that data, CPT and CPTM made sales during the alleged relevant period in the states of Illinois, Iowa, New York, California, and North Carolina as follows: 0.001% of their total cathode ray tube sales during the relevant period were in Illinois (CPT and CPTM color display tube sales of less than 3,000 units to three customers in 1998-2000 and 2004); 0.002% in Iowa (CPTM color picture tube sales of about 5,000 units to one customer in 2005); 0.012% in New York (CPT color display tube sales of less than 25,000 units to two customers in 1994, 1997, and 1998); approximately 0.21% in California (500,000 tubes to a handful of customers); and approximately 0.44% in North Carolina (CPT color display tubes of around 700,000 to a single customer from 1994-1997).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of November, 2014, at Taoyuan, Taiwan.

(printed name)

(signature)